

1 **LEW BRANDON, JR., ESQ.**
2 Nevada Bar No. 5880
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4 Nevada Bar No. 10761
5 **MORAN BRANDON BENDAVID MORAN**
6 630 S. Fourth Street
7 Las Vegas, Nevada 89101
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10 *l.brandon@moranlawfirm.com*
11 *Attorneys for Defendant,*
12 *THE VONS COMPANIES, INC.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RENISHA NIEVES, an individual,

CASE NO.: 2:15-cv-00864-JCM-VCF

Plaintiff,

VS.

10 THE VONS COMPANIES, INC., a
Michigan Corporation, d/b/a VON'S
11 STORE (#2615); DOE Individuals 1-10;
DOE EMPLOYEE and ROE
Corporations 11-20.

Defendants.

LIMITED STIPULATION AND ORDER
REGARDING AGREED PROTECTIVE ORDER

15 COMES NOW, Defendant, THE VONS COMPANIES, INC., by and through its
16 undersigned attorneys, LEW BRANDON, JR., ESQ., JUSTIN W. SMERBER, ESQ. of
17 MORAN BRANDON BENDAVID MORAN, Plaintiff, RENISHA NIEVES, by and through
18 her attorney, JOSHUA DOWLING, ESQ. of COGBURN LAW OFFICES and request an Order
as follows:



MORAN BRANDON
BENDAVID MORAN

ATTORNEYS AT LAW

630 SOUTH 4TH STREET

LAS VEGAS, NEVADA

PHONE: (702) 384-84

1 Defendant has produced the following items, which the parties agree shall be
2 designated as confidential, proprietary and subject to protection in this action until the Court has
3 ruled on a Motion for Protective Order regarding such items. Accordingly, it is agreed
4 Defendant will file a Motion for Protective Order regarding the above-mentioned items by no
5 later than March 28, 2016. In the event Defendant fails to do so, the following items will not be
deemed to be confidential, proprietary or subject to the protection in this action.

1. Employee file of Adam Garbar;
2. Employee file of Angela Baca;
3. Employee file of Larry Garbar;
4. Master Agreement for Floor Care – Janitorial Services between Safeway, Inc./The Vons Company, Inc. and Come Land Maintenance Service Company dated April 20, 2014;
5. Termination of Services Letter from The Vons Company, Inc. to Come Land Maintenance Co, Inc. dated March 23, 2015;
6. Courtesy Clerk Bottom of Basket Policy and Guidelines;
7. Annual Sweep Program Policy and Guidelines;
8. Safeway/Vons Companies Courtesy Clerk Cleaning Training Materials;
9. Safeway/Vons Companies Culture of Safety Training Materials Presentation;
10. Meat/Seafood Departments Sanitation Reference Guide;
11. Welcome to Safeway/Vons Companies Training Guide Presentation;
12. Floor Care Trainer’s Guide;
13. Floor Care Training Evaluation Guide; and
14. Vons Loss Report for falls 2009-2016.



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1 Pending the Court's ruling on Defendant's Motion for Protective Order to be filed by
2 no later than March 28, 2016, the foregoing confidential documents and information contained
3 therein shall be used solely for the prosecution or defense of this litigation. Such confidential
4 documents and information may be disclosed only to the following persons: (a) parties to this
5 litigation; (b) counsel for the parties and persons regularly employed in the offices of counsel
6 for the parties; (c) outside experts or professional advisors retained by a party to assist in the
7 prosecution or defense in the case and persons regularly employed in the offices of such outside
8 experts and professional advisors; (d) court personnel, deponents and court
9 reporters/videographers; provided, however, that prior to such disclosure to the persons
10 describing clause (a) and (c) above, counsel shall furnish a copy of this Protective Order to such
11 person and obtain the written agreement of such person to be bound by the terms of this
12 Protective Order. The requirement of obtaining such a written agreement may be satisfied by
13 obtaining the signature of any such person at the foot of a copy of this Order.

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MORAN BRANDON
BENDAVID MORAN
ATTORNEYS AT LAW

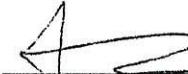
630 SOUTH 4TH STREET
LAS VEGAS, NEVADA 89101
PHONE: (702) 384-8424
FAX: (702) 384-6568

1 Nothing contained in this Protective Order shall preclude Defendant from using its own
2 confidential documents or information in any manner they see fit, or from reviewing such
3 confidential documents or information to whomever they choose, without the prior consent of
4 any other party or of this Court.

5 DATED this 1 day of March, 2016.

6 **MORAN BRANDON BENDAVID MORAN** **COGBURN LAW OFFICES**

7 **LEW BRANDON, JR., ESQ.**
Nevada Bar No. 5880
8 **JUSTIN W. SMERBER, ESQ.**
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Nevada Bar No. 12956
2879 St. Rose Parkway, Suite 200
Henderson, Nevada 89052
Attorneys for Plaintiff,
RENISHA NIEVES

11
12 **IT IS SO ORDERED** this 7th day of March, 2016.

13 
UNITED STATES MAGISTRATE JUDGE

14 *Respectfully Submitted by:*

15 **MORAN BRANDON BENDAVID MORAN**

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17 **LEW BRANDON, JR., ESQ.**
Nevada Bar No. 5880
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